

Grede Code of Business Conduct and Ethics



At Grede, we regard every member of our team as representatives of our company. The actions of every employee, officer, and director affect the reputation and integrity of the Company. They bear the crucial responsibility of preserving our standing for excellence, professionalism, corporate responsibility, ethical behavior, and proper conduct. Ethical behavior forms the very foundation of our business philosophy.

Our commitment to upholding the highest standards of integrity is unwavering. We rely on our Code of Business Conduct and Ethics as the guiding compass that directs our daily choices and actions. It serves as a guiding framework to navigate the complexities of a global market while remaining steadfast in our commitment to social responsibility.

To ensure alignment with our ethical standards, we require all employees of our organization to complete Code of Business Conduct and Ethics training annually. This commitment to training underscores our dedication to upholding ethical principles throughout our company.

Topics and Policies outlined in our Code of Business Conduct and Ethics:

- Whistleblower Policy
- Policy Against Retaliation
- Human Rights
 - Respect for Human Rights
 - Diversity & Inclusion
 - Maintaining A Safe, Healthy and Affirmative Workplace
 - Anti-Human Trafficking and Child Labor
 - Employee Classification and Work Hours
 - Wages & Benefits
 - Freedom of Association and Collective Bargaining
- Anti Trust and Compliance
 - Anti Corruption
 - Compliance with Laws, Rules, & Regulations
 - Conflicts of Interest
 - Memberships on Boards and Committees
 - Political and Other Outside Activities
 - Trade Practices
 - Fair Dealing
 - Anti Trust Compliance
 - Bribery and Other Corrupt Practices
 - International Business Dealings
 - Insider Trading and Fair Disclosure
 - Political Contributions and Activities
 - Subpoenas and Government Investigations
 - Accounting Practices, Books & Records and Record Retention
 - Raising Questions and Concerns
- Protection and Proper Use of Company Assets
 - Theft/Misuse of Company Assets
 - Confidential Information/Privacy
 - Network Use, Integrity & Security
 - Company Travel and Business-Related Expenses
- Inquiries from the Media and Public
- Management Rights
- Violations of this Code

Human Rights and Ethics

This policies demonstrate our dedication to conducting its business ethically, in a manner that respects the dignity and rights of all individuals, both within and outside the organization. We believe that by adhering to these principles, we can build a more just, ethical, and sustainable future for our employees, partners, and the communities we serve.



Human Rights Policy Statement

Respect for human rights is a fundamental value that Grede deeply upholds. Our commitment includes honoring the worth and dignity of all employees, fostering their full potential, and ensuring equal opportunities, in line with universal principles. Grede is an equal opportunity employer, and recruits, hires, trains, promotes, compensates, and administers all personnel actions without discrimination based on any legally protected status.

At Grede, every employee is accountable for maintaining a work environment that champions human rights devoid of discrimination and harassment. If an employee believes that someone is violating the Human Rights policy and/or the law, they are required to report this behavior directly to management, Grede's Corporate Human Resources Department or Grede's Ethics Hotline which is operated by an independent third party,

Grede will not tolerate any retaliation of any kind directed against anyone who reports an issue concerning compliance with this Policy.



Anti-Human Trafficking and Child Labor Policy Statement

The Company and the United States Government prohibit trafficking in persons.

Grede strictly prohibits all forms of forced labor, including modern slavery, human trafficking, and child labor. Grede is committed to upholding children's rights in accordance with the International Labor Organization. We forbid the hiring of individuals under 18 years of age for positions that involve hazardous work, unless otherwise remaining compliant with local, state and federal laws.

The Company's employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom the Company conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.



Anti-Corruption Policy Statement

At Grede, bribery and other corrupt practices are strictly prohibited. We will not seek to influence others, either directly or indirectly, by offering, paying, or receiving bribes or kickbacks, or by any other means that are considered unethical, illegal, or harmful to our reputation of honesty and integrity. Employees and representatives of the company are expected to decline any opportunity that could compromise our ethical principles and reputation.

Grede's employees must not directly or indirectly offer, authorize, request, give or receive anything of value from any person or organization to obtain or retain business or influence a decision or action.

If a Grede Employee is asked for or offered a bribe or improper payment, they must:

- 1) Refuse to make or accept the payment and explain that Grede does not and will not pay or accept bribes.
- 2) Clearly state that their refusal is non-negotiable.
- 3) Immediately report the request to both Management and Grede's Corporate HR Department